

United States Courts  
Southern District of Texas

FILED

January 12, 2022

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

U.S. DISTRICT COURT  
DISTRICT OF MAINE  
PORTLAND  
RECEIVED & FILED

UNITED STATES OF AMERICA )

v. )

GUANG YING XIANG )

a/k/a "Mao Mao," "MoMo," "CiCi" )

Defendant )

2021 DEC 15 P 3: 32

Crim. No. 2:21-cr-00215-T

**4:22-mj-0080**

**INDICTMENT**

The Grand Jury charges that:

**INTRODUCTION**

At all times relevant to this Indictment,

1. Co-Conspirators Shou Chao Li and Derong Miao, husband and wife, and Defendant Guang Ying Xiang were Chinese nationals who were residing in the United States. The Defendant, along with Miao and Li and other co-conspirators, engaged in an interstate prostitution scheme involving multiple female Chinese nationals ("Chinese females").
2. The Chinese females typically entered the United States using B-2 Non-Immigrant Visas (NIVs), which allow for temporary entry for purposes of pleasure, tourism, or medical treatment. Individuals using B-2 NIVs are not permitted to work while in the United States, and individuals who do so are in violation of law. Some of the Chinese females were employed outside the prostitution industry when they first arrived in the United States, but were unable to earn a wage substantial enough to repay debts associated with their travel to the United States. Generally speaking, the Chinese females spoke little to no English and had no familiarity with, or contacts in, Maine and neighboring states, including New Hampshire and Vermont.
3. Prostitution was illegal in Maine, pursuant to 17-A MRSA § 853-A.

**COUNT ONE**  
**Conspiracy**

4. Paragraphs 1 – 3 of this Indictment are incorporated as if fully set forth here.

5. From about June 23, 2016 and continuing until at least about December 13, 2018,  
in the District of Maine and elsewhere,

**GUANG YING XIANG**  
**a/k/a “Mao Mao,” “MoMo,” “CiCi”**

knowingly and willfully conspired with Co-Conspirators Derong Miao (aka “Amy,” “Ronger,”  
“Arong,” “Anna,” “Lily,” and “LiLi”) and Shou Chao Li (aka “Driver,” “Uncle”) and with other  
persons known and unknown to the Grand Jury, to commit offenses against the United States,  
namely:

- A. to knowingly transport individuals in interstate commerce with intent that such individuals engage in prostitution, and attempt to do so, in violation of Title 18, United States Code, Section 2421;
- B. to knowingly persuade, induce and entice individuals to travel in interstate and foreign commerce to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a); and
- C. to use a facility of interstate commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of any unlawful activity, specifically, a business enterprise involving prostitution offenses in violation of the laws of the State in which they were committed and of the United States, and thereafter to perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of the unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3) and (b)(1).

### **OBJECT OF THE CONSPIRACY**

6. The object of the conspiracy involved promoting, managing, and facilitating illegal prostitution activity through the movement and isolation of Chinese females throughout Maine and New Hampshire for the financial benefit of the conspirators.

### **MANNER AND MEANS**

7. It was part of the conspiracy that:

A. Co-Conspirator Miao used WeChat, an online social media platform, among other means of communication, to persuade Chinese females to engage in prostitution in Maine and New Hampshire.

B. Defendant Xiang and Co-conspirator Miao used WeChat to communicate with, and facilitate the prostitution of, these Chinese females.

C. Co-Conspirators Miao and Li and other co-conspirators transported or caused the travel of the Chinese females to various residences and hotels in Maine, New Hampshire and Vermont.

D. Co-Conspirators Miao and Li agreed to pay Defendant Xiang \$20 for every advertisement Defendant Xiang placed on Backpage.com and City X Guide which led to a completed commercial sex act by the Chinese females in Maine and New Hampshire.

E. Defendant Xiang used these advertisements she posted to communicate with prospective prostitution customers, and to arrange prostitution acts between the Chinese females and such customers, in Maine and New Hampshire.

F. Co-Conspirator Miao and Defendant Xiang directed the Chinese females to check in and provide periodic updates after a customer arrived at the hotel room or

residence, when the customers had paid for the prostitution act, and after the customer had left.

G. Defendant Xiang and Co-Conspirators Miao and Li, and others, benefitted financially from the prostitution of the Chinese females.

### **OVERT ACTS**

8. In furtherance of the conspiracy, and in order to accomplish the purposes and objects thereof, the Defendant, and others known and unknown to the Grand Jury, committed or caused to be committed one or more of the following overt acts, among others, in the District of Maine and elsewhere:

#### **Houses of Prostitution**

A. On about the following dates, Co-Conspirators Miao and Li leased identified residential properties and used the properties as locations where acts of prostitution occurred:

(1) From about June 1 – July 18, 2016, Co-Conspirator Li rented the residence located at 5 Verrill Street in Portland, Maine.

(2) Beginning on about July 29, 2016, Co-Conspirators Miao and Li rented the residence located at 977 Brighton Avenue in Portland, Maine.

(3) Beginning on about August 1, 2016, Co-Conspirators Miao and Li rented the residence located at 43 West Street in Manchester, New Hampshire.

(4) Beginning on about September 18, 2016, Co-Conspirators Miao and Li rented the residence located at 87 Harrington Avenue in Manchester, New Hampshire.

#### **Recruitment, Transportation and Travel for Prostitution**

B. Beginning no later than June 2016 and continuing until December 13, 2018, Co-Conspirator Miao used WeChat to communicate with, and arrange for, Chinese

females who were present in the United States to engage in prostitution in Maine, New Hampshire, and Vermont, a region which was described generally as “the Boston area.”

C. Once the Chinese females were identified and expressed interest, Co-Conspirator Miao assisted with transportation and basic logistics which led to several Chinese females traveling interstate to engage in prostitution for the benefit of the conspirators, including the Defendant. Specifically, in October and November 2016, Co-Conspirators Miao and Li assisted Chinese females who travelled from Texas and New York, as well as from New York to Boston, Massachusetts, with ground transportation from Boston to New Hampshire, Portland, and South Portland, Maine. Once in the greater Portland area, Co-Conspirators Miao and Li also transported the Chinese females from hotel to hotel every few days to avoid law enforcement detection.

**Promotion and Management of Prostitution Business Enterprise**

D. On about June 23, 2016, Co-Conspirators Miao and Li sent Defendant Xiang, who was outside Maine, money orders totaling \$1,000 via Western Union as payment for advertising Chinese females for prostitution at locations rented by, or associated with, Miao and Li at a rate of \$20 per commercial sex act performed at those locations in Maine and/or New Hampshire; and on about June 29, 2016, Defendant Xiang deposited the money into her East West Bank checking account.

E. On about July 8, 2016, Co-Conspirator Miao and Li sent Defendant Xiang, who was outside Maine, money orders totaling \$1,000 via Western Union as payment for advertising Chinese females for prostitution at locations rented by, or associated with, Miao and Li at a rate of \$20 per commercial sex act performed at those locations in

Maine and/or New Hampshire; and on about July 13, 2016, Defendant Xiang deposited the money into her East West Bank checking account.

F. On about July 7, 2016, Co-Conspirators Miao and Li sent Defendant Xiang, who was outside Maine, money orders totaling \$1,500 via Western Union as payment for advertising Chinese females for prostitution at locations rented by, or associated with, Miao and Li at a rate of \$20 per commercial sex act performed at those locations in Maine and/or New Hampshire; and on July 13, 2016, Defendant Xiang deposited the money into her East West Bank checking account.

G. On about August 3, 2016, Co-Conspirators Miao and Li sent Defendant Xiang, who was outside Maine, a money order totaling \$500 via Western Union as payment for advertising Chinese females for prostitution at locations rented by, or associated with, Miao and Li at a rate of \$20 per commercial sex act performed at those locations in Maine and/or New Hampshire; and on August 24, 2016, Defendant Xiang deposited the money into her East West Bank checking account.

H. On about August 18, 2016, Co-Conspirator Miao directly wired approximately \$3,190 to Defendant Xiang, who was outside Maine, via her East West checking account, as payment for advertising Chinese females for prostitution at locations rented by, or associated with, Miao and Li at a rate of \$20 per commercial sex act performed at those locations in Maine and/or New Hampshire.

I. On about September 7, 2016, Co-Conspirators Miao and Li sent Defendant Xiang, who was outside Maine, a money order totaling \$1,000 via MoneyGram as payment for advertising Chinese females for prostitution at locations rented by, or associated with, Miao and Li at a rate of \$20 per commercial sex act

performed at those locations in Maine and/or New Hampshire; and on September 16, 2016, Defendant Xiang deposited the money into her East West Bank checking account.

J. On about September 18, 2016, Co-Conspirator Miao sent a check on a joint checking account she shared with Co-Conspirator Li in the amount of \$1,880, to Defendant Xiang, who was outside Maine, as payment for advertising Chinese females for prostitution at locations rented by, or associated with, Miao and Li at a rate of \$20 per commercial sex act performed at those locations in Maine and/or New Hampshire; and on September 26, 2016, Defendant Xiang deposited the money into her East West Bank checking account.

K. On about the dates set forth in the table below, Co-Conspirators Miao and Li leased/rented the identified locations, where the identified Chinese females were actual or registered guests.

L. Defendant Xiang and other co-conspirators outside of Maine, advertised the Chinese females online for prostitution using Backpage.com and/or City X Guide which directed customers to such locations identified in the table below.

Rental Date	Location Rented by Defendant	Guest	Date of Advertisement for Prostitution Directing Customers to Same Location
8/18/2016	977 Brighton Avenue, Portland, ME	Unidentified	8/18/2016
8/23/2016	43 West Street, Manchester, NH	Unidentified	8/23/2016
8/24/2016	Motel 6 (Room 308), Portsmouth, NH	Unidentified	8/24/2016
9/28/2016	Days Inn (Room 132), South Portland, ME	CF #8	9/28/2016
9/28/2016	87 Harrington Avenue, Manchester, NH	Unidentified	9/28/2016
10/2/2016	Days Inn (Room 103), South Portland, ME	CF #6	10/7/2016
10/2/2016	Motel 6 (Room 216), Portsmouth, NH	CF #1	10/7/2016
10/7/2016	Travelodge (Room 228), Portland, ME	CF #9	unknown
10/8/2016	Days Inn, Dover, NH	CF #1	unknown
10/10/2016	Travelodge (Room 228), Portland, ME	CF #1	10/10/2016
10/10/2016	Days Inn (Room 209), South Portland, ME	CF #9	10/12/2016
10/10/2016	Motel 6 (Room 311), Portsmouth, NH	CF #6	10/10/2016 & 10/14/2016
10/17/2016	Days Inn (Room 107), South Portland, ME	CF #22	unknown



Rental Date	Location Rented by Defendant	Guest	Date of Advertisement for Prostitution Directing Customers to Same Location
10/26/2016	Travelodge, Portland, ME	CF #11	10/26/2016
10/27/2016	Room 107, Days Inn, South Portland, ME	CF #11	unknown
10/29/2016	La Quinta (Room 215), South Burlington, VT	CF #1	10/29/2016
11/3/2016	Microtel Inn & Suites (Room 308), Dover, NH	CF #2	11/5/2016
11/6/2016	Comfort Inn (Room 228), South Portland, ME	CF #1	11/7/2016 & 11/8/2016
11/6/2016	Quality Inn & Suites (Room 236), Colchester, VT	CF #2	unknown
11/13/2016	Travelodge (Room 118), Portland, ME	CF #8	11/16/2016
11/14/2016	Days Inn (Room 171), Kittery, ME	CF #12	unknown
11/14/2016	Econo Lodge (Room 200), South Portland, ME	CF #13	11/18/2016
11/19/2016	Days Inn (Room 171) Kittery, ME	CF #2	unknown
11/26/2016	Days Inn (Room 171), Kittery, ME	CF #2	11/27/2016
11/28/2016	Econo Lodge (Room 208), South Portland, ME	CF #15	11/29/2016
11/30/2016	Travelodge (Room 119), Portland, ME	CF #25	11/28/2016
12/4/2016	Days Inn (Room 202), South Portland, ME	CF #15	12/5/2016 & 12/6/2016
12/4/2016	Econo Lodge (Room 100), South Portland, ME	CF #16	12/5/2016
12/6/2016	Travelodge (Room 118), Portland, ME	CF #2	12/6/2016
3/20/2017	Motel 6 (Room 308), Portsmouth, NH	CF #5	unknown
4/5/2017	Days Inn (Room 179), Kittery, ME	CF #7	4/9/2017 & 4/10/2017
4/11/2017	Days Inn (Room 185), Kittery, ME	CF #6	4/11/2017
10/30/2017	Best Western (Room 169), Portsmouth, NH	CF #9	unknown
8/22/2018	87 Harrington Avenue, Manchester, NH	Unidentified	unknown
9/7/2018	87 Harrington Avenue, Manchester, NH	Unidentified	unknown
11/29/2018	87 Harrington Avenue, Manchester, NH	Unidentified	unknown
12/8/2018	87 Harrington Avenue, Manchester, NH	Unidentified	unknown
12/13/2018	87 Harrington Avenue, Manchester, NH	CF #28	unknown

### Prostitution Proceeds

M. While the Chinese females were engaged in prostitution at these locations, Co-Conspirator Miao and Defendant Xiang remained in close communication with them via WeChat and cellular telephones regarding location changes and the collection of prostitution proceeds.

N. In about winter (January – March) 2017, Co-Conspirator Miao traveled to Boston, Massachusetts and distributed cash proceeds generated from the prostitution work of the Chinese females in Maine and elsewhere directly to Defendant Xiang.

Thus, the Defendant violated Title 18, United States Code, Section 371.



**FORFEITURE ALLEGATIONS**

**FIRST FORFEITURE ALLEGATION**

**Conspiracy/SUA Proceeds**

1. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of a conspiracy to violate 18 U.S.C. §§ 2421, 2422(a) and 1952, in violation of 18 U.S.C. § 371, the Defendant

**GUANG YING XIANG**  
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shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violations.

**SUBSTITUTE ASSETS FORFEITURE ALLEGATION**

3. If any of the property described above in the First Forfeiture Allegation, as a result of any act or omission of the Defendant:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- C. has been placed beyond the jurisdiction of the court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,



Assistant United States Attorney

Dated: 12/15/2021

Signature Redacted – Original on file  
with the Clerk's Office